UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, Plaintiff, v. FALCON PETROLEUM, LLC, RGLL, INC., and GRJH, INC., Defendants.	)	Civil Action No. 1:16-cv-1522 (TJM/DJS)

NOTICE OF LODGING OF CONSENT DECREE

The United States of America respectfully gives notice that it is lodging with the Court a proposed Consent Decree that, if approved and entered by the Court, would resolve the United States' claims in the above-captioned action. **At this time, no action is required by the Court with respect to the Consent Decree.**

Pursuant to 28 C.F.R. § 50.7, the United States will publish a notice in the Federal Register that the proposed Consent Decree has been lodged with the Court. The notice will solicit public comment for a period of 30 days. Paragraph 95 of the Consent Decree reflects the parties' agreement that final approval and entry of the Consent Decree is subject to this public comment period. After the close of the comment period, the United States will evaluate any comments received and determine whether any comments disclose facts or considerations that indicate that the proposed Consent Decree is inappropriate, improper or inadequate, and will advise the Court whether the United States requests that the Consent Decree be entered.

Accordingly, the United States respectfully requests that the Court not sign the proposed Consent Decree unless and until the United States moves for entry of the Consent Decree.

Respectfully Submitted,

FOR THE UNITED STATES:

ELLEN MAHAN
Deputy Section Chief
Environmental Enforcement Section
U.S. Department of Justice

Dated: April 25, 2017

/*s/ Ruben Gomez*

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CERTIFICATE OF SERVICE

I certify that today I have electronically filed with this Court the Notice of Lodging of Consent Decree, and the attached Consent Decree, using the CM/ECF system. Notice of this filing will be sent to any registered CM/ECF participants. I also sent an electronic copy via email to counsel for Defendants FALCON PETROLEUM, LLC; RGLL, INC.; and GRJH, INC.:

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/*s/ Ruben Gomez*
RUBEN GOMEZ